

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
KATHLEEN E. CASSIDY  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
KAREN R. KING  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

cfoti@maglaw.com  
212.880.9530

SENIOR COUNSEL  
PAUL R. GRAND  
COUNSEL  
JASMINE JUTEAU

ROBERT G. MORVILLO  
1938 - 2011  
MICHAEL C. SILBERBERG  
1940 - 2002  
JOHN J. TIGUE, JR.  
1939 - 2009

\*ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*ALSO ADMITTED IN CONNECTICUT

December 22, 2022

**VIA ECF**

The Honorable Gabriel W. Gorenstein  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

Re: *Eckhart v. Fox News Network, LLC, et al.*, Case No. 1:20-CV-5593 (RA) (GWG)

Dear Judge Gorenstein:

This firm represents Defendant Ed Henry in the above-referenced matter. We write pursuant to Rule 1(E) of Your Honor's Individual Rules to request an extension of time to answer, move, or otherwise respond to Plaintiff's Fourth Amended Complaint. Plaintiff consents to this request.

On December 20, 2022, Plaintiff filed a Fourth Amended Complaint. (*See* Dkt. No. 227.) Pursuant to Fed. R. Civ. P. 15(a)(3), Mr. Henry's deadline to answer, move, or otherwise respond is January 3, 2023. Mr. Henry requests an extension through January 20, 2023 in light of the upcoming holidays and pressing deadlines in other cases. This is Mr. Henry's first request for an extension to respond to Plaintiff's Fourth Amended Complaint.

Thank you for your consideration.

Respectfully submitted,

/s/ Catherine M. Foti  
Catherine M. Foti